

## Privacy Notice – OPAP Play

### Introduction

Our company, with name “OPAP S.A.”, having its seat at 112 Athinon Ave., Athens (hereinafter “OPAP S.A.”), is, according to the applicable legislation, responsible for processing your personal data within the framework of the provision of games of chance services through VLT game machines.

The protection of your personal data is very important to us. Our team makes every possible effort to protect your personal data at all times, by using top-notch technologies and conducting constant controls.

The present Privacy Notice aims at informing you on the type of personal data that we collect for you, on the way and the purposes for which we collect your data, on the third parties with which we share such data, as well as on your rights, in order for OPAP S.A. to comply with L. 2472/1997, as well as with EU Regulation 679/2016 “on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC”.

### Categories of personal data that we collect and process

The collection and processing of your personal data is made by the responsible, authorized employees / associates of our Company and relates to the information you voluntarily disclosed to us when submitting the application for issuing the Individual Player Card or later, always in accordance with applicable laws and regulations.

In the same context, our Company will collect data that relates to your playing behavior, including, but not limited to, the stores you visit, the game machines you choose, the games you are participating in, the amount of money you play, the time (days and hours) you play, in accordance with the provisions of the Hellenic Gaming Commission Decision 225/2/25.10.2016.

Finally, our company can record and archive all your telephone conversations and other electronic communications with the OPAP Customer Service Department if you wish to ask for clarification regarding your electronic account or to make complaints. In any case you will be informed about the above recording at the beginning of your telephone conversation with the Company.

We emphasize that the collection and processing of the above data is necessary for the fulfillment of the purpose of the Accession Agreement and the operation of the Customer's relationship with the Company and therefore any refusal or opposition to the processing gives the Company the right to cancel the Individual Player Card.

## Why we collect personal data

The information above and the personal data collected by OPAP S.A. will be saved in OPAP S.A.'s databases and servers, always in accordance with the provisions of the applicable legislation and, especially, with those provisions on the confidentiality of communications and on the protection of the person against the processing of personal data. The legal basis, as well as the reasons of processing are the following:

- i. Necessary processing for the performance of the terms of our contractual relationship and for the provision of the Games of Chance services to you. Within this context, we process your data for the following purposes:
  - To create, operate and manage the Player's Account, in accordance with the terms of the Agreement of Accession.
  - To process transactions, including payments.
  - To communicate with the account holders for the announcement of significant changes to the services and the Terms of Use (including the Privacy Notice).
- ii. Necessary processing for the compliance with our legal obligations. Within this context, we process your data for the following purposes:
  - For OPAP S.A. to comply with the applicable legislative framework and, in particular, with the provisions regulating the VLT machines gaming market in Greece.
  - To conduct the necessary security controls, both by capturing images from the CCTV circuits installed in PLAY stores and by identity verification and age confirmation of the Customers, through the control of their identification documents and through the use of their contact details, so as to ascertain that they indeed belong to you.
  - To monitor the transactions, aiming at deterring or verifying cases of fraud, irregular betting, money laundering, for sports integrity matters etc.
  - To comply with our obligations to ensure Responsible Gaming, in particular to prevent the participation of minors and under 21s, and to protect against excessive gaming, in the context of protecting society from addiction for reasons of public interest.
- iii. Necessary processing for the purposes of our legal interests, namely:
  - For the improvement of the services provided especially by recognizing the Player when he/she calls the call center, so that he/she is given priority in terms of service, and so that the agent attending to him/her has the details of his/her electronic account readily available.
  - For the provision of evidence as to the transactions effected, by processing recorded oral or written (in soft or hard copy) communication.
  - Specifically, the mobile telephone number provided by the Player will be also used for his/her immediate information in case of detection of transactions of his/her Individual Player Card that raise reasonable suspicions of non-authorized use or of fraud, without this meaning that OPAP S.A. undertakes the obligation to detect any eventual non-authorized use or suspicious transaction.
- iv. Processing based on your specific consent.

If you wish, by marking in the relevant fields at the end of the Declaration, you may give your consent to the Company to process your personal data for the following purposes:

  - For the implementation of compliance programs according to the commercial communication rules issued by the Hellenic Gaming Commission (HGC), the Company may process your personal data entered into the Central Information System and, in particular, information relating to your playing behavior.

- In order to make commercial communications, the Company may process your personal data that it receives outside of the Central Information System.

In any case, you hold the right to revoke the aforementioned specific consent to the processing of your personal data for the particular reasons and to request your data's deletion at any given moment. In such case, the company will stop any processing that is based on your consent, without this affecting the lawfulness of the processing that was based on your consent prior to its withdrawal or of the processing described under points i to iii.

## **Recipients**

The processing of your personal data, within the context of the provision of Games of Chance services, will be carried out by the competent employees of OPAP S.A. who are duly authorized to this end. Recipients of the personal data are also third parties (external partners, such as call center services providers), to the extent that this is necessary for your optimum service and for the provision of our services. In this case, our company undertakes that its partners are under the control and act only following its orders, that they have been specifically authorized for this purpose and that they are fully bound by secrecy and by the obligations set forth in the legislation on the collection and processing of the aforementioned data.

Finally, we shall inform you that our company may disclose your data to the competent administrative authorities, insofar as this is imposed by the applicable legislative and regulatory framework, following relevant request or when it ought to submit a report with the said data, without giving you any special prior notice.

## **Retention Period**

Your personal data will be kept for ten (10) years as of their registration and, in any case, for five (5) years as of the end of the customer relationship.

## **Your Rights**

You have the right to access, namely the right to be informed, following your request, on the extent to which your personal data is being processed, and to receive further information regarding the processing carried out. Furthermore, you have the right to request the rectification of inaccurate personal data referring to you or the supplementation thereof, and if the conditions set out in Law are met, to exercise the right of deletion, the right of processing limitation, the right of data portability, and the right of opposition to its processing. In case you exercise the rights to correction, deletion and limitation of your data, these requests will also be forwarded to any the third parties/ recipients, to which this data was disclosed within the framework of provision of Games of Chance services.

You can exercise any of the abovementioned rights by submitting a written request to OPAP. You can expect a reply to such a request within one (1) month following its receipt by OPAP and in any case, within three (3) months, if the complexity of your request or in general the number of requests received, so requires.

Finally, you shall promptly notify OPAP S.A. of any eventual change to the information that you provided upon registering and opening your online account.

### **Disclaimer**

Our services are not addressed to persons below twenty one (21) years of age. Any person who provides his/her details to us through any of our services warrants that he/she is above twenty one (21) years of age. We do not take on any obligation or liability for the practices, actions or policies that are beyond our control.

The present Privacy Policy may be amended. We will make sure to inform you on any amendment but, in any case, we invite you to visit our Website regularly, where the updated Privacy Policy will be posted.

### **Our Commitments**

OPAP reassures that it has taken all adequate technical and organizational measures, according to current technological standards and applicable laws and regulations, to guarantee that the processing of your personal data (by OPAP or by any third parties on behalf of OPAP) is lawful, adequate and secure against any unauthorized or accidental access, disclosure, processing, erasure, modification or other use.

### **Contact Information**

For any request regarding the processing of your data, within the framework of provision of Games of Chance services, as well as in case you ascertain that we have not observed the principles stipulated in the present Privacy Policy, we kindly ask you to address, the soonest possible, OPAP S.A.'s Personal Data Protection Officer at email address [dpo@opap.gr](mailto:dpo@opap.gr).

In case you consider that the protection of your personal data is affected in any way, you may appeal to the Hellenic Data Protection Authority, using the following details: Website: [www.dpa.gr](http://www.dpa.gr) | Address: 1-3 Kifisias Ave., 115 23, Athens | Call Center: +30 210 6475600 | Fax: +30 210 6475628 | email: [contact@dpa.gr](mailto:contact@dpa.gr)